

EXHIBIT 19

In the Matter Of:

In Re: Google Antitrust Investigation


December 09, 2021



1 [REDACTED]
2 is what is Project Sunday?

3 MS. ELMER: And I instruct the
4 witness not to answer the question to
5 the extent that it calls for
6 information protected by the attorney
7 work product doctrine and the
8 attorney-client privilege. To the
9 extent that she can answer it without
10 invading the privilege, I will allow
11 that.

12 A. Project Sunday refers to an
13 investigation that was conducted under
14 supervision of legal counsel in response to
15 privacy and antitrust investigations
16 globally.

17 Q. Who initiated Project Sunday?

18 MS. ELMER: Same instruction. I
19 instruct the witness not to answer the
20 question on the basis of
21 attorney-client privilege and work
22 product doctrine.

23 Q. [REDACTED], are you accepting your
24 attorney's advice and following her advice
25 not to answer the question?

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2 A. Yes.

3 Q. Did you have any role in Project
4 Sunday?

5 MS. ELMER: You may answer.

6 A. I was one of the people who
7 reviewed some of the contents.8 Q. When did your work on Project
9 Sunday begin?

10 A. I don't recall the timeframe.

11 Q. Do you recall when your work on
12 Project Sunday ended?

13 A. No.

14 Q. Is your work on Project Sunday
15 ongoing?16 A. I'm no longer on the team, so my
17 work on the project is not ongoing.18 Q. Were there any business reasons
19 for undertaking Project Sunday?20 A. No. It was in response to privacy
21 and antitrust legal issues globally.22 Q. Were any business decisions made
23 based on the analysis undertaken in Project
24 Sunday?

25 MS. ELMER: I instruct the

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witness not to answer on the basis of
the work product doctrine and
attorney-client privilege.

Q. Are you going to follow your
attorney's advice?

A. Yes.

Q. In the course of Project Sunday,
did you ever receive any materials from any
non-attorney outside advisor, such as an
investment banking firm?

MS. ELMER: Same instruction.

Q. Will you follow your attorney's
advice not to answer?

A. Yes.

Q. Are you familiar with the term
"Project Monday"?

A. Somewhat.

Q. What is Project Monday?

MS. ELMER: Same instruction.

To the extent that you can answer
without revealing privileged
information or work product
information, ██████████, you can.
Otherwise please refrain from doing

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so.

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A. I don't actually remember what
Project Monday refers to.

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Q. Did you have any role in Project
Monday?

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A. I don't recall.

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Q. You don't recall having any role
in Project Monday?

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A. Correct.

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Q. Are you familiar with the term
"Project Stonehenge"?

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A. Yes.

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Q. What is Project Stonehenge?

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A. Again, it was an investigation
related to responding to some of the privacy
and antitrust issues globally, and it was
conducted under legal counsel.

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Q. Who within Google was in charge of
Project Stonehenge?

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A. Some of the people working on
Google Ad Manager.

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Q. Who were those people?

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A. I remember [REDACTED] and

[REDACTED].

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Q. Did you have any role in Project Stonehenge?

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A. Only in reviewing some of the materials that they produced.

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Q. Were there any business reasons for undertaking Project Stonehenge?

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A. Not that I recall.

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Q. When did your work on Project Stonehenge begin?

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A. I don't recall.

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Q. Do you recall when your work on Project Stonehenge ended?

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A. No.

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Q. Is your work on Project Stonehenge still ongoing?

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A. I'm no longer on the team, so my work is not ongoing.

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Q. Were there any business decisions made based on the analysis undertaken in Project Stonehenge?

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MS. ELMER: Same instruction. I instruct the witness not to answer on the basis of work product doctrine and attorney-client privilege.